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ANCHOR QEA

Memorandum

September 14, 2017

To: Gary Miller, Carlos Sanchez, USEPA Region 6

From: David Keith, Anchor QEA, LLC

cc: Phil Slowiak, International Paper Company (IP)
Dave Moreira, McGinnes Industrial Maintenance Corporation (MIMC)

Re: San Jacinto River Waste Pits Post-Harvey Diver Sampling Procedures

This memorandum was prepared in response to the U.S. Environmental Protection Agency (USEPA) – Environmental Response Team (ERT) Diver Sediment Sampling Procedures work plan provided to IP and MIMC (Respondents) for review on September 13, 2017. IP and MIMC provided their preliminary comments to that work plan to USEPA in a letter to Anne Foster from Al Axe on September 13, 2017. The Respondents discussed refinements to the work plan and sampling approach with USEPA the morning of September 14, 2017. USEPA believes there are areas of potential rock displacement, and areas of undisturbed rock with accumulations of sediment. The sampling is to be conducted in each of these areas as USEPA directs. The approach involves having a certified dive team provided by the Respondents work with the USEPA dive team to perform sampling at the same locations using equivalent sampling methodology as described below.

The procedures for the sampling shall include the following:

1. USEPA dive team members identify sampling locations at potential rock displacement areas and nearby areas of undisturbed rock with accumulations of sediment, and shall mark these locations with a buoy, or other marker that does not penetrate the underlying substrate.
    a. The support team on the dive boat shall record the GPS coordinates of the sample location as accurately as possible.
    b. Samples shall be taken at each designated location
2. After a location is identified, the Respondents' diver shall go to that location and collect a surface sample of sediment using the following procedures:
    a. Each sample shall be collected using a pre-cleaned and laboratory certified 8-ounce sample jar by sliding the jar along the surface, and using a pre-cleaned spoon or spatula to push the surface material into the jar. The jar, or utensil shall not penetrate more than 3 inches into the sediment, and in no instance, shall the jar or utensils disturb any competent cap materials. After the diver collects adequate material in the jar, it will be immediately capped and taken to the boat for labeling,

logging, and placed in an ice chest. Post sample observations and logging shall include:

i. Decanting water off of the top of the sample
ii. Photographing the sediment in the jar with the cap removed
iii. Providing a written description of each samples' color, texture, grain size, odor, or any other distinguishing feature
iv. Removing any size fractions greater than gravel – defined as greater than 64 mm.

3. After the Respondents' diver has collected a sample, USEPA shall go to the same location and collect a sample using the same procedures.
4. Equipment decontamination, chain of custody, and data validation and usability assessments will be conducted according the Sampling and Analysis Plan: Sediment Study, San Jacinto River Waste Pits Superfund Site (Integral Consulting Inc & Anchor QEA, LLC, 2010).
5. Samples will be analyzed by ALS Laboratories for dioxins and furans using USEPA method 1613B/8290A. Craig Hutchings from Integral Consulting will serve as the Laboratory Quality Assurance Coordinator.

The Respondents' dive team may collect additional samples beyond those directed by USEPA using the procedures described above.

Please provide your concurrence of these procedures through the signature line below:

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Gary Miller, Remedial Project Manager, USEPA Region 6